

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

ROBERT CASAR and MICHAEL FINK,)
v.)
Plaintiffs,)
CRUNCHBASE, INC.,)
Defendant.)
Case No. 1:23-cv-950
Honorable Charles Esque Fleming
Magistrate Judge Jonathan D. Greenberg

SECOND JOINT STATUS REPORT ON STATUS OF MEDIATION

Plaintiffs Robert Casar and Michael Fink (“Plaintiffs”) and Defendant Crunchbase, Inc. (“Crunchbase”) (collectively, the “Parties”), hereby provide an updated status of mediation pursuant to this Court’s Docket Text Order of May 30, 2024.

1. The Parties exchanged mediation statements and participated in a full-day mediation session before Honorable Sidney Schenkier (Ret.) of JAMS on May 22, 2024.

2. In the mediation session, the Parties exchanged information and made progress in defining the proposed settlement class for the claims made in the complaint and also the proposed settlement classes for the claims made in a related action, *Madrenas v. Crunchbase, Inc.*, 1:23-cv-3651, pending in the Northern District of Illinois (the “Illinois Action”). The Parties further agreed to Plaintiff filing a Second Amended Complaint in the Illinois to add claims for alleged violations of the respective right of publicity statutes in Alabama, California, Indiana and Nevada. Plaintiff filed its Second Amended Complaint on June 25, 2024.

3. The information exchanged and the progress made formed the framework of a potential settlement.

4. The Parties have scheduled a second mediation session with Judge Schenkier, but

due to the availability of Judge Schenkier and the schedules of the Parties and their counsel, the Parties will not be able to participate in a second mediation until July 24, 2024.

5. In the interim, the Parties are continuing to negotiate on their own and have made additional progress. Plaintiffs made a demand on June 19, 2024, and Crunchbase is reviewing the demand and anticipates responding to it in the near future.

6. The Parties respectfully suggest that they provide the Court with a status of the outcome of the second mediation by July 29, 2024.

7. Given that the Parties have not reached a settlement to date, and pursuant to the Court's May 30, 2024 Order, the Parties hereby propose the below case management schedule:

Event	Deadline
Disclosure of Plaintiffs' expert report	December 20, 2024
Deposition of Plaintiffs' expert	January 31, 2025
Disclosure of Crunchbase's expert report	February 28, 2025
Deposition of Crunchbase's expert	March 28, 2025
Disclosure of Plaintiffs' expert rebuttal report	April 25, 2025
Deadline for completion of discovery	May 9, 2025
Deadline to file class certification motion	May 30, 2025
Deadline for dispositive motions	60 days after class certification ruling
Deadline for opposition to dispositive motions	30 days after the filing of dispositive motions
Deadline for filing replies in support of dispositive motions	14 days after the filing of opposition to dispositive motions

Respectfully submitted,

/s/ Wallace C. Solberg

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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Wallace C. Solberg